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DEC 24 1996

RE FILED

December 15, 1996

Office of the Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20554

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Re: **Comments on CC Docket No. 96-45**

Enclosed are comments on CC Docket 96-45 submitted by the Washington State E911 Program.

Sincerely,

Robert G. Oenning

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cc: Service List

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BEFORE THE
Federal Communications Commission
Washington, D.C.

In the matter of)
)
Federal-State Joint board on) CC Docket No. 96-45
Universal Service)
)
)

COMMENTS OF THE WASHINGTON STATE ENHANCED 911 PROGRAM

The Washington State E911 Program was created by voter referendum in 1991 for the explicit purpose of assuring that enhanced 911 is made available to all the citizens of Washington. It is a state-wide mandate with enhanced 911 to be available by December 31, 1998. No distinctions were made for type of telephone equipment or method of service delivery.

The inclusion of enhanced 911 within the definition of services supportable within the universal services support mechanisms is laudable, and clearly in concert with the direction given by the voters of Washington to make Enhanced 911 universal. ¹

Enhanced 911 has become essential to the safety of the public as an increasingly mobile population and a common media experience create the expectation that not only is 911 the number to call for assistance, but also that the call will be accomplished through a system that knows where the caller is located. ²

¹ Referendum 42, Passed November 1991

² The expectation of location information may best exemplified by the misuse of 911 for non-emergency calls which many times begin with: "Can you tell me how to get to -----?". Public education programs have been demonstrated as an effective tool for eliminating the these calls, but it is clear from the question that there is an expectation that the caller thinks the 911 telecommunicator knows the beginning location. Additionally, when legislators promulgate laws such as those that require police response to domestic violence

Enhanced 911 is correctly included for support in the universal service formula. In supporting access to enhanced 911 (Sec.51) the question arises to what is included under the term "access". To a large degree this is indirectly stated by the comments concerning the inability of the wireless carriers to provide location information at this time and the note that the "local governments provide the PSAP". It is also noted that "the telecommunications network is only one component of E911 service". Combined, these statements are taken to indicate that access to E911 service as a supported function will include the network components from recognition of the digits 911 through delivery of the call, with the associated caller identification and location information, to the correct PSAP. It is assumed that this will be done within some standard level of service and standardized data parameters.

The requirement as indicated has considerable merit for it allows the carriers to determine and manage the technologies of their delivery systems independent of outside requirements. This will also permit evaluation of the E911 service delivery costs under all the proposed cost models. That latter point may be extremely important given the temporary exclusion of wireless from the requirement to provide enhanced 911 because it will create a clear separation of service delivery mechanisms between carrier types.

Inclusion of E911 as a universal service element implies integration into the carrier operations to a degree that E911 elements would be part of the carrier managed network that supersedes the provisions of the Telecommunications Service Priority system. This recognizes the critical nature of 911 as the access point for services during any disaster that is disruptive to

situations there is an assumption on the part of the legislators that the 911 system will pass location information to assist dispatching, given the likelihood that the situation itself will preclude useful address inquiry.

the telecommunications systems. Without 911 operational, many of the service restoration priorities have little meaning because the calls for assistance would not be processed by the network.

Inclusion of enhanced 911 within the definition of services supportable within the universal services support mechanisms recognizes both the expectations of the customer and the long term interests of assuring competitive service delivery.

Respectfully submitted,



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Washington E911 Program

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